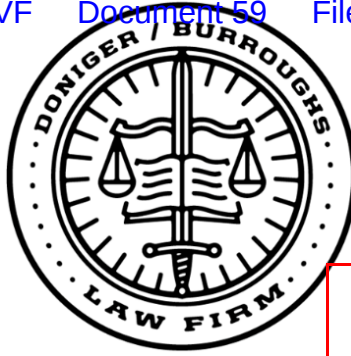


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July 1, 2025

**DELIVERED VIA ECF**

Honorable Valerie Figueredo  
United States District Court  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

  
**HON. VALERIE FIGUEREDO**  
**UNITED STATES MAGISTRATE JUDGE**

**Dated: 7/2/2025**

Plaintiff's request to stay discovery and continue  
discovery deadlines pending the parties' upcoming  
discovery conference is GRANTED.  
The Clerk of Court is respectfully directed to  
terminate the gavel at ECF No. 58.

**Case Title:** *RRPIX, Inc. adv. Victoria A. Int'l, LLC; et al.*  
**Civil Action No.:** 23 Civ. 5491 (AT)  
**Re:** Request to Stay Discovery

Your Honor:

This office represents the Plaintiff, RRPix, Inc., in the above referenced matter. We write to request that the Court stay discovery in this action and continue all discovery deadlines pending the conference ordered by the Court (Dkt. No. 55).

Good cause exists for this request. The current deadline for fact discovery is August 15, 2025. The conference to be held by the Court is set to address the discovery disputes raised by Plaintiff in its letter of June 18, 2025 (Dkt. No. 53). The Court has currently scheduled the conference for August 13, 2025 at 2pm EST, only two days before the close of discovery, and Defendant has requested, with our consent, that this conference be adjourned to the following week for personal reasons (Dkt. No. 56). Thus, if discovery is not stayed and the deadline continued, the present discovery disputes between the parties will not be addressed until after the close of fact discovery.

In light of the foregoing, Plaintiff respectfully requests that discovery be stayed, and all discovery deadlines continued pending the parties' upcoming discovery conference ordered by the Court. Defendant consents to this request. This is Plaintiff's first request of this nature.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

By: /s/ David M.S. Jenkins  
Scott Alan Burroughs  
David M.S. Jenkins  
DONIGER / BURROUGHS  
For the Plaintiff